

Peter Goldstein [SBN 6992]
PETER GOLDSTEIN LAW CORP
peter@petergoldsteinlaw.com
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 474-6400
Facsimile: (888) 400-8799

Malcolm P. LaVergne [SBN 10121]
mlavergne@lavernelaw.com
400 South 4th Street, Suite 500
Las Vegas, Nevada 89101
Telephone: (702)448-7981
Facsimile: (702)966-3117

Attorney for Plaintiff
KEYHERRA GREEN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEYHERRA GREEN,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the State
of Nevada and the County of Clark and operating
CLARK COUNTY DETENTION CENTER
(CCDC); NAPHCARE, INC., a foreign corporation,
doing business in State of Nevada and is the Medical
Care Provider for the Clark County Detention
Center; FRED MERRICK; LORA CODY;
MENENLYN ELIZAN; RAY MONTENEGRO;
GWENDOLYN MYERS; and DOES 4-10, inclusive,

Defendants.

Case No. 2:20-cv-00769-KJD-DJA

CORRECTED STIPULATION AND ORDER
TO EXTEND DEADLINE TO FILE
PLAINTIFF'S REPLY TO LVMPD
DEFENDANTS' RESPONSE TO
PLAINTIFF GREEN'S MOTION FOR
LEAVE OF COURT TO FILE FOURTH
AMENDED COMPLAINT [ECF No. 100]

(First Request)

COMES NOW, Plaintiff, Keyherra Green, and Defendants, Las Vegas Metropolitan Police
Department, Fred Merrick and Lora Cody, by and through their counsel of record, and hereby submit
this Stipulation and Order to Extend Deadline for Plaintiff to file a Reply to Defendants' Response to
Plaintiff Green's Motion for Leave of Court to File Fourth Amended Complaint [ECF No. 100] from
April 17, 2023 to April 24, 2023. This is the first request for an extension of time to file a reply and
is not made for an improper purpose. This request is made in order for the parties to confer to

determine whether they can reach a stipulation to resolve disputed issues regarding the proper scope of the proposed amended pleadings.

DATED this 18th day of April, 2023.

PETER GOLDSTEIN LAW CORP

KAEMPFER CROWELL

By: /s/ Peter Goldstein
Peter Goldstein
Nevada Bar No. 6992
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
-and-
MALCOM P. LAVERGNE & ASSOC.
Malcom P. LaVergne
Nevada Bar No. 10121
400 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

By: /s/ Lyssa S. Anderson
Lyssa S. Anderson
Nevada Bar No. 5781
Ryan W. Daniels
Nevada Bar No. 13094
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Attorneys for Defendants
Las Vegas Metropolitan Police
Department, Fred Merrick and
Lora Cody

IT IS SO ORDERED

DATED this 19th day of April 2023.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE